

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SARAH FELTS,

Plaintiff,

V.

Case No. 4:20-cv-821-JAR

LEWIS E. REED,

ST. LOUIS BOARD OF ALDERMEN,

PRESIDENT,

Defendant.

**MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF PLAINTIFF’S
STATEMENT OF UNCONTROVERTED MATERIAL FACTS**

Plaintiff requests leave to file the attached Reply in Support of Plaintiff's Statement of Uncontroverted Material Facts. In support, Plaintiff states:

1. Defendant's Response to Plaintiff's Statement of Uncontroverted Material Facts, Doc. 90, in addition to responding to facts submitted by Plaintiff, submits additional statements of fact.
2. The proposed Reply in Support of Plaintiff's Statement of Uncontroverted Material Facts, attached hereto as Exhibit 1, is necessary to respond to the additional facts submitted by Defendant, and to address Defendant's responses purporting to dispute facts where the record reflects no genuine dispute exists.

WHEREFORE Plaintiff moves this Court for leave to file the attached Reply in Support of Plaintiff's Statement of Uncontroverted Material Facts and for such other and further relief as is just and proper under the circumstances.

DATED: November 23, 2021

Respectfully Submitted,

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